

9 September 2016

Mr Paul Retter
Chief Executive Officer
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000
Via NTC portal

**INCREASING HEAVY VEHICLE VOLUMETRIC LOAD CAPACITY WITHOUT INCREASING
MASS LIMITS - ISSUES PAPER – JULY 2016**

Dear Paul

Gas Energy Australia appreciates the opportunity to respond to the National Transport Commission *Increasing heavy vehicle volumetric load capacity without increasing mass limits - Issues paper (July 2016)*. Gas Energy Australia supports increasing volumetric limits and further commends the NTC on their work investigating increasing mass limits of heavy vehicles to improve productivity as exemplified by the recent Twinsteer and Tri Drive Mass Limits, and Review of quad-axle groups discussion papers.

Gas Energy Australia is concerned that the issue of increasing volumetric limits while maintaining mass limits as outlined in the issues paper takes a different approach to recent NTC engagements which sought to improve productivity through improved mass limits. Gas Energy Australia contends that all issues should be looked at to improve productivity and that both volume and mass constraints should be issues for discussion and not mutually exclusive.

Gas Energy Australia supports the issues papers general theme that volumetric loads be increased and congratulates the NTC on other consultations to increase specific mass limits. That said, we wish to highlight one item in the drafting of the issues paper, in that it uses “freight productivity” and “productivity” interchangeably throughout the document. Gas Energy Australia contends that “productivity” is a more encompassing measure than a simple freight productivity measure and further Gas Energy Australia supports a broad definition of productivity which includes factors related to the environment such as vehicle emissions, both greenhouse gases and toxic tailpipe emissions.

Gas Energy Australia looks forward to continuing to work with the NTC to continue to improve the productivity, safety and environmental outcomes from transport in Australia.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a long horizontal flourish extending to the right.

John Griffiths
Chief Executive Officer
Gas Energy Australia